



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

MKP/TH/MJL/KMT
F. #2017R01840

*271 Cadman Plaza East
Brooklyn, New York 11201*

May 3, 2019

By ECF

The Honorable Nicholas G. Garaufis
United States District Judge
United States District Court
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Keith Raniere
Criminal Docket No. 18-204 (S-2) (NGG)

Dear Judge Garaufis:

The government and defense write jointly to respectfully request an extension until May 24, 2019 to submit their proposed jury charges, which is more than two weeks before the government expects to rest its case-in-chief. If the Court wishes that the proposed jury charges be submitted prior to opening statements, the parties respectfully request an extension until May 6, 2019.

Respectfully submitted,

RICHARD P. DONOGHUE
United States Attorney

By: /s/
Moir Kim Penza
Tanya Hajjar
Mark J. Lesko
Assistant U.S. Attorneys
(718) 254-7000

cc: Clerk of Court (NGG) (by ECF)
Counsel of Record (by ECF)